

STATE OF SOUTH CAROLINA

Combined Application for Certificate of Environmental
Compatibility, Public Convenience and Necessity and for a
Base Load Review Order for the Construction and
Operation on a Nuclear Facility at Jenkinsville, South
Carolina

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

COVER SHEET

DOCKET

NUMBER: 2008 - 196 - E

(Please type or print)

Submitted by: K. Chad Burgess

SC Bar Number: 69456

Address: SCANA Corp.
1426 Main Street MC 130
Columbia, SC 29201

Telephone: 803-217-8141

Fax: 803-217-7931

Other: _____

Email: chad.burgess@scana.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input checked="" type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

November 20, 2008



VIA ELECTRONIC FILING

The Honorable Charles Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive (29210)
Post Office Drawer 11649
Columbia, South Carolina 29211

RE: Combined Application of South Carolina Electric & Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity and for a Base Load Review Order for the Construction and Operation of a Nuclear Facility at Jenkinsville, South Carolina
Docket No. 2008-196-E

Dear Mr. Terreni:

On or about November 10, 2008, Mr. Joseph Wojcicki filed a document with the Public Service Commission of South Carolina ("Commission") in the above-referenced docket styled as "Motion to Change the Location of the Two New Reactors Planned by Applicant." This letter serves as the response of South Carolina Electric & Gas Company ("SCE&G" or "Company") to Mr. Wojcicki's motion.

SCE&G has pre-filed extensive testimony and exhibits in this docket explaining that the existing Virgil C. Summer Nuclear Station site near Jenkinsville, South Carolina is a superior site for the construction and operation of two new nuclear base load generating facilities. For the reasons set forth in SCE&G's combined application and prefiled testimony and exhibits, the Company respectfully disagrees with his proposal. Therefore, based upon the Company's testimony and exhibits prefiled in this docket, which is incorporated herein by reference, SCE&G respectfully requests that the Commission deny Mr. Wojcicki's motion.

By copy of this letter, SCE&G is serving all those persons and entities included on the Service List for Docket No. 2008-196-E posted on the Commission's website with this response and attach a certificate of service to that effect.

If you have any questions or concerns, please advise.

Very truly yours,

A handwritten signature in black ink, appearing to read "K. Chad Burgess".
K. Chad Burgess

KCB/kms
Enclosures

The Honorable Charles Terreni

November 20, 2008

Page 2

cc: Nanette S. Edwards, Esquire
Shannon Bowyer Hudson, Esquire
Scott Elliott, Esquire
E. Wade Mullins, Esquire
Damon E. Xenopoulos, Esquire
Robert Guild, Esquire
Carlisle Roberts, Esquire
Joseph Wojcicki
Lawrence P. Newton
Maxine Warshauer and Samuel Baker
Mildred McKinley
Pamela Greenlaw
John Frampton
Chad Prosser
David L. Logsdon
Roger Stroup
John V. Walsh
David Owen and Charles Ramsey
The Honorable Gregrey Ginyard
Ruth Thomas
(all via First Class U.S. Mail)

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2008-196-E**

IN RE:

Combined Application of South Carolina)
Electric & Gas Company for a Certificate)
Of Environmental Compatibility and Public)
Convenience and Necessity and for a Base)
Load Review Order for the Construction and)
Operation of a Nuclear Facility in)
Jenkinsville, South Carolina)

**CERTIFICATE
OF SERVICE**

This is to certify that I have caused to be served this day one (1) copy of the
**SCE&G's Response to Mr. Joseph Wojcicki's Motion to Change the Location of the
Two New Reactors Planned by Applicant** filed on behalf of South Carolina Electric &
Gas Company, to the persons named below via First Class U.S. Mail:

Shannon Bowyer Hudson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Nanette S. Edwards, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Scott Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, SC 29205

E. Wade Mullins, Esquire
Bruner Powell Robbins Wall & Mullins LLC
PO Box 61110
Columbia, SC 29260

Damon E. Xenopoulos, Esquire
Brickfield, Burchette, Ritts & Stone, PC
1025 Thomas Jefferson Street NW
8th Floor West Tower
Washington, DC 20007-5201

Robert Guild, Esquire
Friends of the Earth
314 Pall Mall
Columbia, SC 29201

Joseph Wojcicki
820 East Steele Road
West Columbia, SC 29170

Meira Warshauer
Samuel Baker
3526 Boundbrook Lane
Columbia, SC 29206

Pamela Greenlaw
1001 Wotan Road
Columbia, SC 29229

Lawrence P. Newton
57 Grove Hall Lane
Columbia, SC 29212

Carlisle Roberts, Esquire
SC Department of Health and Environmental Control
Legal Department
2600 Bull Street
Columbia, SC 29201

John Frampton
SC Department of Natural Resources
1000 Assembly Street
Columbia, SC 29201

Chad Prosser
SC Department of Parks, Recreation and Tourism
1205 Pendleton Street
Columbia, SC 29201

David L. Logsdon
SC Department of Commerce
1201 Main Street, Suite 1600
Columbia, SC 29201

Roger Stroup
SC Department of Archives and History
8301 Parklane Road
Columbia, SC 29221

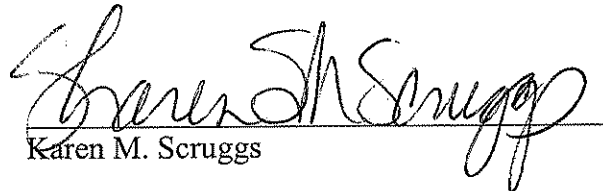
John V. Walsh
SC Department of Transportation
PO Box 191
Columbia, SC 29202

David Owen
Charles Ramsey
SC Forestry Commission
PO Box 21707
Columbia, SC 29221

Ruth Thomas
1339 Sinkler Road
Columbia, SC 29206

The Honorable Gregrey Ginyard
366 Lakeview Drive
Jenkinsville, SC 29065-9541

Mildred A. McKinley
2021 Carroll Drive
West Columbia, SC 29169


Karen M. Scruggs

Columbia, South Carolina
This 20th day of November 2008